

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA AT ELKINS**

**FRIEDRICHS HARRIS, ADMINISTRATOR OF
THE ESTATE OF EVAN M. HARRIS,**

Plaintiff,

v.

**CIVIL ACTION NO.: 2:16-cv-00046
JUDGE BAILEY**

**Q&A ASSOCIATES, INC., A WEST VIRGINIA
CORPORATION, ANGELA SHOCKLEY, KEITH
BISHOP, MATTHEW SHOCKLEY, AND SANDY
SCHMIEDEKNECHT, and TAMMY ROBBINS.**

Defendants.

DEFENDANTS' VOIR DIRE

1. Do you or any members of your immediate family know the Plaintiff, Friedrichs Harris, or any members of his family?
2. Plaintiff is represented by David Sims. Do any of you know Mr. Sims or his law practice the Law Offices of David A. Sims?
3. Have any of you or any of your friends or family members ever been represented by Mr. Sims?
4. Do you or your immediate family know any of the named Defendants:
 - a. Angela Shockley
 - b. Keith Bishop
 - c. Matthew Shockley
 - d. Sandy Schmeideknecht
 - e. Tammy Robbins
5. Do you or any members of your immediate family know anyone who is employed

by Q&A Associates, Inc?

6. Do you or any members of your immediate family know anyone who has participated in any programs at Q&A Associates, Inc.?
7. This lawsuit arises from allegations surrounding the suicide of Evan Harris while he was a program participant at Q&A Associates, Inc. on January 24, 2016. Do any of you have any personal knowledge about the facts of this case?
8. Do you have any experience in law, psychiatry, or counseling?
9. Have you had any friends or family members that have committed suicide?
10. Have you ever served on a jury before this case? What kind of case? Did anything occur during the trial of any case where you served on a jury that would affect your ability to sit as a fair and impartial juror in this matter?
11. Do any of you believe that lawsuits are a problem in our society?
12. Have you or has any member of your immediate family ever made a claim or filed a lawsuit for injuries, wrongful death or damages? If so, please explain.
13. Have you or has any member of your immediate family ever been sued for damages? If so, please explain. Did anything occur in either of those situations which would affect your feelings in this case?
14. Have you read, heard or discussed anything about negligence actions, lawsuits, or liability crisis that would adversely affect your ability to sit as a fair and impartial juror in this matter?
15. Have you formed an opinion concerning anything you may have read, heard, or discussed about negligence actions, lawsuits or liability crisis that would adversely affect your ability to sit as a fair and impartial juror in this matter?

16. Do you feel that lawsuits are filed too often? If so, please state why.
17. Do any of you hold any religious opinions or beliefs that would make it difficult for you to sit as a fair and impartial juror in this trial?
18. At the conclusion of the trial, the Court will instruct as to the law you are to follow in your deliberations. Is there anyone who cannot follow the law as instructed?
19. The Court will instruct you that you cannot decide this case based on sympathy. Do any of you feel that you could not set aside that sympathy for Mr. Harris and his family and decide this case solely based on the evidence?
20. Is there anything in your background or experience that makes you feel that you may have some interest, financial or otherwise, in the outcome of this case?
21. Do you have any belief or feeling that Q&A Associates, Inc. and the Defendants must be at fault merely because a lawsuit was filed against them?
22. If, after hearing all of the evidence in this case and the instructions of the Court, you believe that Q&A Associates and the other Defendants are not liable to Plaintiff can you return a verdict in the Defendants' favor?
23. Do you realize that, whether or not you agree with the law, it is your duty to follow the law as the Court defines it for you?
24. The law states and the Court will instruct you that Plaintiff must prove his case by a preponderance of the evidence. If Plaintiff should fail to prove his case by a preponderance of the evidence, is there any reason why you would be unable or unwilling to find in favor of Q&A Associates, Inc. and the other Defendants?
25. In this trial, as in all trials, Plaintiff has the burden of proof and, therefore will present his evidence first. However, the Court will instruct you that you should not form an

opinion concerning a verdict in this case until after you have heard all of the evidence, and the instructions which the Court will give you as to the law. Can you listen to and consider all of the evidence presented, and to the Court's instructions before making a determination in this case?

DEFENDANTS,

By Counsel

/s/ Lindsey M. Saad

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Defendants.

CERTIFICATE OF SERVICE

I certify that on this 7th day of May, 2018, I filed electronically via CM/ECF a true copy of **“DEFENDANTS’ PROPOSED VOIR DIRE”** with notice of the same being electronically served by the Court to the following:

David A. Sims, Esq.
Law Offices of David A. Sims, PLLC
P.O. Box 5349
Vienna, WV 26105

/s/ Lindsey M. Saad
Lindsey M. Saad (WV Bar No. 11155)